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7
8 UNITED STATES DISTRICT COURT
DISTRICT OF THE NORTHERN MARIANA ISLANDS

9
10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 DOMINIC CHPTWELONG, *et al.*,

14 Defendants.
15

No.: CR 08-00017

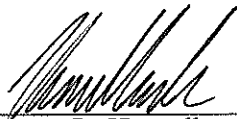
**STIPULATED MOTION TO
CONTINUE DEADLINE FOR
PRE-TRIAL MOTIONS**

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17 The United States and Defendants Dominic Chptwelong, Masaiohy Daikichi Sallem and
18 James Ochcha, by and through undersigned counsel, respectfully move this Court to continue the
19 deadline for pre-trial motions in the above-captioned matter, which is currently set for May 29, 2008,
20 until Monday, June 23, 2008. The extension is necessary, in order for the parties to have sufficient
21 time to obtain and review any transcripts, and to file any necessary, pre-trial motions in this cause.
22 Additionally, counsel for Defendant Ochcha, Robert Torres, will be off-island from June 12, 2008,
23 through June 18, 2008.

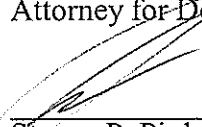
24 Given the imminence of the current pre-trial motions deadline, the government is attempting
25 to make special arrangements to obtain any transcripts on an expedited, rolling basis. The relatively
26 short turn-around time, a backlog of orders of at least three weeks at the court reporting service
27 customarily used by the government, and related concerns have limited transcription options to a
28

1 court-reporting service on Hawaii. Despite concerted efforts by counsel for the government, at
2 present it is questionable whether data could be transmitted to Hawaii, transcribed and returned to
3 Saipan in time for counsel to meet the present pre-trial motions deadline.

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5 Respectfully submitted this 21st day of May, 2008.

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8 _____
9 George L. Hasselback
10 Attorney for Dominic Chptwelong

5/21/08
Date

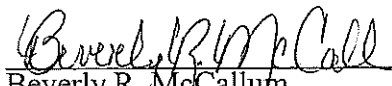
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12 _____
13 Steven P. Pixley
14 Attorney for Masioshy Daikichi Sallem

5/21/08
Date

15 
16 _____
17 Robert T. Torres
18 Attorney for James Ochcha

5/21/08
Date

19 LEONARDO M. RAPADAS
20 United States Attorney
21 Districts of Guam and the
22 Northern Mariana Islands

23 
24 _____
25 Beverly R. McCallum
26 Assistant United States Attorney

5-21-08
Date